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January 11, 2006

FEDERAL EXPRESS

Hon. Frederic Block
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert Hopkins, et. al.
03-Cr-1268 (FB)

Dear Judge Block:

With great respect and profound apologies, I have no option but to ask the Court for leave to withdraw from our earlier contemplated participation as counsel in this case.

At the time our letter of December 8, 2005 was sent to your Honor, wherein I indicated that Mr. Hopkins "has requested that this firm enter an appearance in this case and thereby represent him for all post-verdict proceedings, including motions, sentence and any appeal," we had been assured in writing by certain benefactor parties, including an attorney, that the initial portion of our requested retainer would be forthcoming out of the proceeds of a real estate closing that was to conclude by year's end. To date, despite numerous, repeated and determined entreaties by both Mr. Baker and myself to the individual who, on behalf of Mr. Hopkins had assured us that this commitment would be met, our retainer not been paid. We have today been informed that we will not be retained and are to perform no further work on this case.

Based on the foregoing, because the work to be done in this case is considerable, it would be economically disastrous for this firm to proceed and file a formal Notice of Appearance on behalf of Mr. Hopkins. We have notified Mr. Hopkins of our application to withdraw and he fully understands and is sensitive

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to the reasons which I am today articulating.

It is respectfully requested that your Honor relieve us of any further obligations in this case. Please understand that while this application is made reluctantly, nevertheless, given what we understand to be the magnitude of and the complex nature of the issues which need to be litigated, and the substantial legal undertaking that would be involved, it is not possible for our firm to remain as counsel of record without being compensated.

Thank you in advance for the extraordinary courtesy this Court has always extended to counsel in this and all other proceedings.

Respectfully,


BENJAMIN BRAFMAN
BB2285

cc: Robert Hopkins
Michael H. Warren, Assistant United States Attorney
[Via Telefax (718) 254-6478]

*Request Granted
50 CR 3783 D*
1/18/06
January 18, 2006